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*Attorney for Defendants Law Offices of
Mitchell D. Bluhm & Associates, LLC, CP Medical
and Capio Partners, LLC*

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

GEORGE KIPERASH,

Plaintiff,

v.

MITCHELL DEAN BLUHM, a Georgia
debt collection attorney, MARK
DETRICK, THE LAW OFFICES OF
MITCHELL D. BLUHM &
ASSOCIATES, LLC, a Georgia Limited
Liability Company, CP MEDICAL, LLC, a
Nevada Limited Liability Company,
CAPIO PARTNERS, LLC, a Texas
Limited Liability Company,

Defendants.

NO.

NOTICE OF REMOVAL

TO: THE CLERK OF THE ABOVE-ENTITLED COURT;

AND TO: ROBERT MITCHELL, Plaintiff's Attorney

NOTICE OF REMOVAL UNDER 28 U.S.C.
§1441(a) - 1

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1 PLEASE TAKE NOTICE that defendants The Law Offices of Mitchell D. Bluhm &
2 Associates, LLC, CP Medical, LLC and Capio Partners, LLC (“Served Defendants”), by
3 and through their attorneys Andrews Skinner, P.S., hereby remove the above-entitled action,
4 originally captioned to be filed in the State of Washington, Spokane County Superior Court,
5 to the United States District Court for the Eastern District of Washington, pursuant to 28
6 U.S.C. §1331; 1441 and 1446 without waiver of any defenses.

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8 1. On April 3, 2014, Served Defendants were each first served with a Summons
9 and Complaint, by process server to CT Corporation System, evidencing plaintiff’s intent to
10 commence an action against them in the State of Washington, Spokane County Superior
11 Court, entitled *George Kiperash v. Mitchell Dean Bluhm, a Georgia debt collection*
12 *attorney, Mark Detrick, the Law Offices of Mitchell D. Bluhm & Associates, LLC, a*
13 *Georgia Limited Liability Company, CP Medical, LLC, a Nevada Limited Liability*
14 *Company, Capio Partners, LLC, a Texas Limited Liability Company.* A true and correct
15 copy of the Plaintiff’s Summons and Complaint (the State Court Action) is attached hereto
16 as Exhibit A.

17 2. Upon information and belief, the State Court Action has not yet been filed in
18 the State of Washington, Spokane County Superior Court.

19 3. Defendants Michael Dean Bluhm and Mark Detrick have not been served
20 with the Complaint in the State Court Action.
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1 4. Pursuant to 28 U.S.C. §1331, this court would have jurisdiction over the State
2 Court Action because if filed as currently plead in Exhibit A, the matter would be brought
3 under the laws of the United States. Specifically, the Complaint in the State Court Action
4 alleges a cause of action which arises under 15 U.S.C. §1692 et seq. ("The Fair Debt
5 Collection Practices Act").

6 5. As required by 28 U.S.C. §1446(b), this Notice of Removal is properly filed
7 within thirty (30) days of the Receipt of the Summons and Complaint in the State Court
8 Action by process service upon CT Corporation System.

9 6. Venue is proper pursuant to 28 U.S.C. §1441(a) because the Eastern District
10 of Washington embraces the place in which the removed State Court Action would be
11 pending if filed in the State Court identified in the served complaint.

12 7. Served Defendants will promptly file a copy of this Notice of Removal with
13 the Clerk of the State of Washington, Spokane County Superior Court and a copy of this
14 Notice of Removal is being concurrently served upon Plaintiff through his counsel of
15 record.

16 8. Removal of the State Court Action is therefore proper under 28 U.S.C. §1441
17 and 1446.

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1 DATED this 23rd day of April, 2014.

2 ANDREWS ▪ SKINNER, P.S.

3
4 By/s/Pamela M. Andrews

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Attorneys for Defendants Law Offices of
Mitchell D. Bluhm & Associates, LLC, CP
Medical LLC and Capio Partners, LLC

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NOTICE OF REMOVAL UNDER 28 U.S.C.
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CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record, listed below:

Robert Mitchell
Attorney at Law
1020 N. Washington
Spokane, WA 99201
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bobmitchelllaw@yahoo.com

ANDREWS ▪ SKINNER, P.S.

By/s/Pamela M. Andrews

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Mitchell D. Bluhm & Associates, LLC, CP
Medical LLC and Capio Partners, LLC

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§1441(a) - 5

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